

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CureIS Healthcare, Inc.,

Plaintiff,

v.

Epic Systems Corporation,

Defendant.

Case No.: 3:25-cv-04108-MMC

**DECLARATION OF JENNIFER
PETERSON IN SUPPORT OF DEFENDANT
EPIC SYSTEMS CORPORATION'S
MOTION TO TRANSFER VENUE**

I, Jennifer Peterson, declare as follows:

1. I am a Human Resources Director at Epic Systems Corporation ("Epic"), the defendant in the above-listed action. I have been employed at Epic since 2001.

2. I make this declaration in support of Epic's motion to transfer venue to the Western District of Wisconsin pursuant to 28 U.S.C. § 1404(a). Except as otherwise indicated, I have personal knowledge of the facts stated herein and could testify competently thereto if called to do so in this matter.

3. Epic is a healthcare software developer in the United States that is incorporated in Wisconsin with its principal place of business and headquarters in Verona, Wisconsin. The address for Epic's corporate headquarters is 1979 Milky Way, Verona, WI 53593-9179.

4. Epic's headquarters has been in or around Madison, Wisconsin for as long as I have been employed at Epic and, as I understand it, since Epic's inception in 1979. Prior to moving to its current campus in Verona, Wisconsin, Epic was headquartered in neighboring Madison, Wisconsin.

5. Epic does not have, nor has it ever had to my understanding, any offices or place of business in California. Epic's only physical office locations in the United States are its corporate headquarters in Verona, Wisconsin, where more than 12,000 Epic employees maintain

1 an office, and an office in Rochester, Minnesota, where approximately 20 Epic employees
2 maintain an office.

3 6. As of June 10, 2025, Epic employs approximately 12,275 employees in the
4 United States, and approximately 12,231 of those employees work at Epic's headquarters in
5 Verona, Wisconsin.

6 7. Since at least 2006, it has been Epic's general policy that employees must live
7 within 45 minutes driving distance of its Verona, Wisconsin campus. Accordingly, it is my
8 understanding that nearly all of Epic's employees reside in the state of Wisconsin.

9 8. Epic houses its documents at Epic's headquarters in Verona, Wisconsin. To the
10 extent there are documents relevant to this action in Epic's possession—including, for example,
11 communications with customers, customer records, communications with CureIS, corporate
12 policies, product roadmaps, and marketing materials—such documents are located within or
13 accessible from Epic's headquarters in Verona, Wisconsin. Epic does not store any corporate
14 documents in the state of California.

15 9. Epic's corporate decision making and operations take place at its headquarters in
16 Verona, Wisconsin, including the adoption and implementation of all business strategies and
17 policies, the development and sales of all products, facilitation of customer relationships, and
18 communications and integration with any third-party systems.

19 10. Epic's software is designed, developed, maintained, programmed, and tested at
20 Epic's headquarters in Verona, Wisconsin, including software related to Epic's Tapestry product.
21 Epic employees with knowledge of all aspects of the design, development, and release of Epic's
22 software are located in Wisconsin, as are documents related to same.

23 11. Tapestry is Epic's managed care operations application that has been in existence
24 nearly 30 years. Tapestry combines a number of managed care related functions into one
25 application. For example, customers can use Tapestry to, among other things, track membership
26 enrollment, authorize services, manage high-risk members, pay claims, collect premiums, and
27 respond to member and provider inquiries. Epic has nearly 400 employees on its Tapestry team
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1 across all roles, including more than 130 developers, all of whom work in-person at Epic's
2 headquarters in Verona, Wisconsin. These individuals are highly knowledgeable about Tapestry,
3 including the continued development and maintenance of its numerous features. Members of
4 Epic's Tapestry team regularly work with the Epic customers named in the Complaint on various
5 issues, including, for example, to facilitate the customer's use of third-party solutions during the
6 implementation process and to develop any features that a customer may request. For example, a
7 developer on Epic's Tapestry team is knowledgeable about Epic's development of features for
8 [REDACTED] related to revenue recovery, including the
9 original request from [REDACTED], Epic's internal development efforts, and any timelines that
10 Epic committed to throughout the project.

11 12. Epic licenses its electronic health records software and revenue cycle
12 management software to large healthcare organizations, including health systems, hospitals, and
13 payers, located in all 50 states. As of today, there are approximately 600 organizations in Epic's
14 customer community.

15 13. Epic assigns a dedicated support team for each customer, and for each Epic
16 application. Specifically, Epic assigns each of its customers an Epic employee whom Epic refers
17 to as a BFF ("Best Friend Forever"), who works with operational leads, project leads, and project
18 sponsors at the customer. The BFF partners with other members of a customer's Epic support
19 team to ensure organizations have the support they need to share the latest and greatest
20 developments. Epic also assigns each of its customers a Technical Coordinator ("TC"), who is
21 the primary contact at Epic for a customer's project leadership after applications are live.
22 Depending on the size and complexity of a customer, more than one TC may be assigned to a
23 customer. TCs are members of the Technical Services ("TS") team at Epic and oversee live
24 application support, integrated technical areas, and large projects such as upgrades.

25 14. Epic's BFFs and TCs are among the primary individuals responsible for
26 communicating with Epic's customers. To the extent Epic sends any form of widespread
27 communication to its customers like those alleged by CureIS, Epic's BFFs and/or TCs would be
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1 knowledgeable about such communications, and such communications most likely would have
2 been drafted at Epic's headquarters in Verona, Wisconsin and sent by Epic's Wisconsin-based
3 BFFs or TCs.

4 15. [REDACTED] is an Epic customer named in the
5 Complaint that is headquartered in [REDACTED]. [REDACTED] assigned BFF is [REDACTED] and its
6 two TCs are [REDACTED] and [REDACTED], all of whom are Epic employees who reside and work in
7 Wisconsin.

8 16. [REDACTED] is an Epic customer named in the Complaint that is headquartered
9 in [REDACTED]. [REDACTED] assigned BFF is [REDACTED] and its two TCs are
10 [REDACTED] and [REDACTED], all of whom are Epic employees who reside and work in
11 Wisconsin.

12 17. [REDACTED] is an Epic customer named in the Complaint that is headquartered
13 in [REDACTED]. [REDACTED] assigned BFF is [REDACTED] and its TC is
14 [REDACTED], both of whom are Epic employees who reside and work in Wisconsin.

15 18. [REDACTED] is an Epic customer named in the Complaint that is headquartered in
16 [REDACTED]. [REDACTED] assigned BFF is [REDACTED] and its three TCs are [REDACTED]
17 [REDACTED], [REDACTED], and [REDACTED], all of whom are Epic employees who reside and
18 work in Wisconsin.

19 19. [REDACTED] is an Epic customer named in the Complaint that
20 is headquartered in [REDACTED]. [REDACTED] assigned BFF is [REDACTED] and its TC is
21 [REDACTED], both of whom are Epic employees who reside and work in Wisconsin.

22 20. [REDACTED] is an Epic customer named in the Complaint that
23 is headquartered in [REDACTED]. [REDACTED] assigned BFF is [REDACTED] and its TC
24 is [REDACTED], both of whom are Epic employees who reside and work in Wisconsin.

25 21. [REDACTED] is an Epic customer named in the Complaint that is headquartered in
26 [REDACTED]. [REDACTED] assigned BFF is [REDACTED] and its two TCs are
27 [REDACTED] and [REDACTED], all of whom are Epic employees who reside and work in Wisconsin.
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1 22. Any request by CureIS to integrate with Epic's technology would have most
2 likely been facilitated by Epic's Consultant Relations and/or Vendor Relations teams, who also
3 work at Epic's headquarters in Verona, Wisconsin.

4 23. Epic's Technical Communications team is tasked with the creation and
5 distribution of promotional materials to Epic customers, including materials communicating the
6 vast number of functionalities that are included in a customer's license agreement such as the
7 brochure referenced by CureIS in the Complaint. Epic employees on this team with knowledge
8 about the aforementioned promotional materials all work at Epic's headquarters in Verona,
9 Wisconsin.

10 24. Litigating this case in the Western District of Wisconsin would be significantly
11 more convenient for Epic and its employees. Because Epic's employees work and reside in
12 Wisconsin, if called to testify at trial in this action, employees would be required to travel to San
13 Francisco, California. Travel to and from San Francisco would be more burdensome and
14 disruptive to Epic's employees than attendance at any trial or hearing within the Western District
15 of Wisconsin.

1 I DECLARE, under penalty of perjury, that the foregoing is true and correct.

2 Dated this 17th day of June, 2025.

3 
4 Jennifer Peterson